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April 4, 2025

VIA ECF

Honorable Natasha C. Merle
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201
Email: Merle_Chambers@nyed.uscourts.gov

Re: *Correa Morales v. Escobar Restrepo*
Case No. 1:24-cv-07951-NCM-TAM

Dear Judge Merle:

On March 28, 2025, this Court issued Findings of Fact and Conclusions of Law granting Petitioner's petition and ordering L.C. (the "Child") be returned to Colombia (the "Order") (ECF No. 62). The Court further directed the parties to submit a joint proposed order of return by April 4, 2025. The Clerk of Court entered judgment in favor of Petitioner on March 31, 2025 (ECF No. 63).

Pursuant to the Order, the parties have attempted to confer and have been unable to reach an agreement regarding the return of the Child to Colombia.

Petitioner proposes the following travel arrangements: that the Clerk of Court release the Child's two passports to the Petitioner for the purpose of the Child's return to Colombia; that the Petitioner be permitted to pick up the Child from the Respondent's residence at a mutually agreed-upon time, no later than April 13, 2025; and that the Child be returned to Colombia no later than April 13, 2025. Petitioner has secured a spot for L.C. at the "Anglo Español" School in Colombia. L.C. can commence his studies there on April 21, 2025 (once the spring break is over) without further academic disruption. Petitioner has already arranged, and remains ready to facilitate, the transition so that any impact on L.C.'s school life would be minimal upon his return.

Additionally, the Petitioner respectfully requests that this Court issue an order allowing the Petitioner to obtain a U.S. passport for the minor Child without the Respondent's consent or signature. Despite efforts by Petitioner's counsel to have the Respondent sign the required passport consent form (DS-3053), the Respondent has not yet agreed to do so. This matter is time-sensitive, as Petitioner has an appointment in New York on April 8th to obtain a new passport for the Child so he can return to Colombia by the proposed return date of April 13, 2025.

Respondent objects to the Child's returning to Colombia before June 26, 2025, the last day of the child's academic year. In Respondent's view, the Child may be further harmed developmentally and educationally by his sudden removal from school and by not being allowed to complete the school year at the institution he has attended since 2024. Respondent proposes that Petitioner collect the Child from her home on June 28, 2025 to return him to Colombia.

Respondent does not object to signing the requested passport application authorization form. Respondent's attorney has forwarded the form to her and is expecting her response once Respondent arrives home from work this evening.

Respondent intends to exercise her appellate rights and will seek a stay of the Court's Order in connection with her appeal.

Very truly yours,

/s/Richard Min

Richard Min

Attorney for Petitioner

/s/ Edgar Loy Fankbonner

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cc: All Counsel (by ECF)